

Exhibit

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RENALDO NAVARRO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RENALDO NAVARRO,

Plaintiff,

vs.

MENZIES AVIATION, INC., doing
business as MENZIES and DOES 1 through
10, inclusive.

Defendants.

Case No.: 3:10-cv-08157 VC

**DECLARATION OF MARC ILAGAN
IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO SUMMARY JUDGMENT**

Date: November 19, 2020
Time: 10:00 a.m.
Place: video conference link

Hon. Vince Chhabria
San Francisco Courthouse
Courtroom 4 – 17th Floor

Action Removed: December 16, 2019
Action Filed: October 23, 2019

1 I, Marc Ilagan, have personal knowledge of the matters stated herein and if called upon as
2 a witness, I would competently testify as follows:

3 1. I started working at ASIG as a fueler, until the company was bought by Menzies
4 Aviation, Inc. ("Defendant"). I continued to work for Defendant, until I left the company in
5 February 2020. I became a supervisor after Mr. Navarro left in September 2018.

6 2. I am Filipino American. My national origin is the Philippines. My race is Filipino.

7 3. In 2018, I was a shop steward – for the Union. It was part of my job to
8 communicate to supervisors and managers problems or complaints fuelers had that happened
9 while working.

10 4. In 2017 Andrew Dodge became a supervisor.

11 5. Many fuelers had complaints against Dodge in 2017 and 2018. Some of the
12 complaints I received from fuelers were that they missed their meal breaks. I heard that Mr.
13 Dodge would use flashlights against fuelers, acting like he was a security force.

14 6. It was well known that Dodge slept in the truck, even when the company truck
15 was in the tarmac. This is dangerous but there was no action done with Dodge. Even the general
16 manager knew about this but there was no action.

17 7. One time, he harassed me as well. He was abusing his authority and tried to get
18 me in trouble because of my use of the company truck. He did this just to power trip over me.
19 He did this to many Filipino fuelers just because he can.

20 8. I spoke to Ray Navarro about this incident because he was the supervisor during
21 that graveyard shift. Ray assisted me and calmed things down. Ray said he would talk to
22 management.

23 9. It was only when management was not listening to us that we decided to put
24 together a petition. The first petition, it was Jezen Canlas and myself who worked on it. Rafael
25 Vasquez helped us as well. We got signatures from most of the fuelers.

26 10. Mr. Navarro also signed the petition but I did not see him ask others to sign, or to
27 pressure others to sign. The truth of the matter, it was easy to have fuelers sign the petition. Most
28 understood that Mr. Dodge was bad for the company.

11. During the union meetings with management that I attended, we complained about

Dodge. No action was taken by management.

I declare under penalty of perjury under the laws of the United States and in the State of California that the foregoing is true and correct.

marc ilagan
Marc Ilagan

Oct. 31, 2020
Date

Document ID: 9VY4Y152

andrea@liberationlawgroup.com

Nombre del documento:

Declaration of Marc Ilagan.pdf

Función hash de seguridad SHA256:

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31 de Octubre de 2020 a las 23:34 (UTC)

De:

SignRequest <no-reply@signrequest.com> on behalf of
(andrea@liberationlawgroup.com)

A:

marc_ilagan@yahoo.com

Sujeto:

andrea@liberationlawgroup.com le ha enviado una solicitud
de firma SignRequest

Mensaje:

Dear Mr. Ilagan:

Good afternoon. Please sign where indicated. Should you have questions, please email me at
andrea@liberationlawgroup.com. Thank you.

Sincerely,

Andrea Ortiz

Dirección IP:

71.202.210.109

Agente de usuario:

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Oct. 31, 2020

Firma añadida, página 3:

marc ilagan

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